

ESTTA Tracking number: **ESTTA765537**

Filing date: **08/19/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91223065
Party	Plaintiff PN, LLC
Correspondence Address	SCOTT AUSTIN VLP LAW GROUP LLC 101 NE THIRD AVE, STE 1500 FORT LAUDERDALE, FL 33301 UNITED STATES saustin@vlplawgroup.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Scott R. Austin
Filer's e-mail	saustin@vlplawgroup.com
Signature	/Scott R. Austin/
Date	08/19/2016
Attachments	8.19.16 SRA Consent Motion for Extension of Trial and Discovery Periods.pdf(174899 bytes)

In the Matter of Application Serial No. 86/256,711
For the Trademark: PN (stylized design)
Application Date: April 18, 2014
Published in the Official Gazette on April 7, 2015

Applicant.

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Opposition No. 91223065

DISCOVERY AND TRIAL PERIODS WITH CONSENT

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agreement seek to avoid reduction in the time provided for discovery. The extension and resetting of the discovery and trial periods for these proceedings will allow the parties' time necessary to determine the likelihood of settlement. To extend all respective discovery deadlines under the Board's prior Scheduling Order by 60 days will reset the schedule for the Discovery and Trial Periods in accordance with 37 C.F.R. § 2.121(c), as follows:

Initial Disclosures Due	9-18-2016
Expert Disclosures Due	1-16-2017
Discovery Closes	2-15-2017
Plaintiff's Pretrial Disclosures	4-1-2017
Plaintiff's 30-day Trial Period Ends	5-16-2017
Defendant's Pretrial Disclosures	5-31-2017
Defendant's 30-day Trial Period Ends	7-15-2017
Plaintiff's Rebuttal Disclosures	7-30-2017
Plaintiff's 15-day Rebuttal Period Ends	8-29-2017

Applicant, through its counsel, has consented to the 60 day extension and resulting resetting of the Discovery and Trial Periods requested herein via email correspondence with counsel for Opposer, Scott R. Austin, on August 8, 2016.

In light of the foregoing, Opposer respectfully requests that the Board grant Opposer's Consent Motion and extend the Discovery and Trial Periods to all of the respective dates set forth above.

Dated: August 19, 2016

/Scott R. Austin/
Scott R. Austin
VLP Law Group LLP
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saustin@vlplawgroup.com
Attorneys for Opposer

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that the MOTION TO EXTEND AND RESET DISCOVERY AND TRIAL PERIODS WITH CONSENT was filed electronically through the Electronic System for the Trademark Trial and Appeal Board (ESTTA) on this 19th day of August, 2016.

/Scott R. Austin/
Scott R. Austin
VLP Law Group LLP

CERTIFICATE OF SERVICE BY MAIL
AND ELECTRONIC MAIL PER STIPULATION OF COUNSEL

I hereby certify that on August 19, 2016, a true and correct copy of the MOTION TO EXTEND AND RESET DISCOVERY AND TRIAL PERIODS WITH CONSENT is being served on the below opposing counsel/party of record, by mailing said copy via First Class Mail, postage prepaid and by sending a courtesy copy via Electronic Mail pursuant to stipulation and agreement between the respective counsel of record for the parties to this Opposition at the Discovery Conference held April 19, 2016, as follows:

SCOTT A. CONWELL, Esq.

CONWELL LAW LLC

2368 Northcliff Drive, Ste B

Jarrettsville, MD 21084

Email address: scott@conwellusa.com

Date of Mailing and Electronic Mailing: August 19, 2016

Printed Name: Scott R. Austin

Signature: s:/Scott R. Austin/